

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

TODD TARGGART, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

NEXT BRIDGE HYDROCARBONS, INC.,  
KEN RICE, GEORGE PALIKARAS,  
ROBERT L. COOK, CLIFTON DUBOSE,  
JR., JOSEPH DEWOODY, LUCAS T.  
HAWKINS, DELVINA OELKERS, MIA  
PITTS, KRISTIN WHITLEY, and GREGORY  
MCCABE,

Defendants.

Case No.: 1:24-cv-01927-FB-JAM

Hon. Frederic Block

**DECLARATION OF ADAM M. APTON IN SUPPORT OF THE NBH INVESTOR  
GROUP'S MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND  
APPROVAL OF SELECTION OF COUNSEL**

I, Adam M. Apton, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner with the law firm Levi & Korsinsky, LLP ("Levi & Korsinsky"), counsel for lead plaintiff movants Todd Targgart, Steven Martinez, and Mohammed Limon (the "NBH Investor Group") and proposed Lead Counsel for the Class.

2. I submit this Declaration, together with the attached exhibits, in support of the NBH Investor Group's motion for appointment as Lead Plaintiff and approval of its selection of Levi & Korsinsky as Lead Counsel for the Class.

3. Attached hereto as the exhibits are true and correct copies of the following:

**Exhibit A:** PSLRA Certifications signed by each member of the NBH Investor Group attesting to their acquired shares of Next Bridge Hydrocarbons, Inc. ("NBH" or the "Company") in connection with the Company's spin-off

from Meta Materials, Inc. (“Meta Materials”) on or around December 14, 2022;

**Exhibit B:** Loss Chart reflecting the losses incurred by each member of the NBH Investor Group as a result of their transactions in NBH shares;

**Exhibit C:** Press Release published March 15, 2024, on *Globe Newswire*, announcing the pendency of the securities class action against defendants herein: *Targgart v. Next Bridge Hydrocarbons, Inc., et. al.*, Case No. 1:24-cv-01927-FB-JAM;

**Exhibit D:** Declaration signed by each member of the NBH Investor Group in support of their lead plaintiff motion; and

**Exhibit E:** Firm Résumé of Levi & Korsinsky, proposed Lead Counsel for the Class.

I declare under penalty of perjury that the foregoing facts are true and correct.

Dated: May 14, 2024

Respectfully Submitted,

**LEVI & KORSINSKY, LLP**

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*Lead Counsel for the NBH Investor Group  
and [Proposed] Lead Counsel for the Class*